

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASHMAN EQUIPMENT CORP.,

Plaintiff,

vs.

**EMCS CARIBBEAN LTD., CRAIG
NOBLETT, NERVIN WHEATLEY, and
ASHBURN HARRIGAN,**

Defendants.

Civil Action No. 1:21-cv-10862-RGS

PROOF OF SERVICE

NOW COMES Scott D. Brownell, counsel for Plaintiff, Cashman Equipment Corp., who submits this sworn statement as proof of service upon Defendant, EMCS Caribbean, Ltd., as required by this Court's directive included within Rec. Doc. 15.

1.

Undersigned has personal knowledge of the facts set forth herein.

2.

That on the 12th day of October, 2021, he personally caused to be served by international registered mail, copies of Rec. Doc. 15, *Notice of Default* (including a copy of the CM/ECF email transmitting same), upon EMCS Caribbean Ltd., in compliance with Fed.R.Civ.Pro. 5(b)(2)(C). A copy of the documents served and the United States Postal Service Form 3806, Registered Mail Receipt are attached hereto as Exhibit "1."

3.

Service was provided to Defendant's registered agent, SHRM Trustees, (BVI) Ltd. A true and correct copy of the portion of the British Virgin Islands' Register of Companies making this appointment is attached hereto as Exhibit "2."

4.

Pursuant to Fed.R.Civ.Pro. 5(b)(2)(C), service upon EMCs Caribbean, Ltd. was complete upon mailing on October 12, 2021.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 18TH DAY
OF OCTOBER, 2021.

/s/ Scott D. Brownell

Scott D. Brownell (Louisiana Bar #26223)
SCOTT D. BROWNELL, APLC
527 E. Boston St., Suite 201
Covington, LA 70433
Phone: (504) 390-1982
Fax: (985) 387-5087
E-mail: scott@sbrownell.com

Dated: October 20, 2021

Attorney for Plaintiff Cashman Equipment Corp.

Registered No.

RE254896793US

Date Stamp

To Be Completed By Post Office		Postage \$ 11.30	Extra Services & Fees <small>(continued)</small>
		<input type="checkbox"/> Registered Mail \$ 1.71	<input type="checkbox"/> Signature Confirmation \$
		<input type="checkbox"/> Return Receipt (Hardcopy) \$ 4.11	<input type="checkbox"/> Signature Confirmation Restricted Delivery \$
		<input type="checkbox"/> Return Receipt (Electronic) \$ 1.01	<input type="checkbox"/> Restricted Delivery \$
		Total Postage & Fees \$ 12.85	
Customer Must Declare Full Value \$ 10.00		Received by <i>[Signature]</i>	
Domestic insurance up to \$50,000 is included based upon the declared value. International indemnity is limited. (See Reverse).			
Covington, LA 70433			
FROM <i>Scott D. Brownell</i> 527 E. Boston St., Suite 201 Covington, LA 70433			
TO EMCIS Caribbean c/o SHRM Trustees (BVI) Ltd PO Box 4301, Road Town Tortola VG1110 BVI			

PS Form 3806, Registered Mail Receipt Copy 1 - Customer
 April 2015, PSN 7530-02-000-9051 (See Information on Reverse)
 For domestic delivery information, visit our website at www.usps.com

EXHIBIT

1

tabbies®



COVINGTON
1775 N COLUMBIA ST
COVINGTON, LA 70433-9998
(800)275-8777

10/12/2021 09:28 AM

Product	Qty	Unit	Price
First-Class™Intl Letter	1		\$1.30
British Virgin Islands			
Weight: 0 lb 0.80 oz			
Registered			\$17.15
Amount: \$0.00			
Tracking #:			
RE254896793US			
Total			\$18.45
 Grand Total:			\$18.45
 Credit Card Remitted			\$18.45
Card Name: AMEX			
Account #: XXXXXXXXXX4002			
Approval #: 883130			
Transaction #: 691			
AID: A000000025010801		Chip	
AL: AMERICAN EXPRESS			
PIN: Not Required			

USPS is experiencing unprecedented volume
increases and limited employee
availability due to the impacts of
COVID-19. We appreciate your patience.

Save this receipt as evidence of
insurance. For information on filing an
insurance claim go to
<https://www.usps.com/help/claims.htm>

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Cashman Equipment Corp.

Plaintiff

v.

Civil Action No. 21-10862-RGS

EMCs Caribbean LTD., Craig Noblett,
Nervin Wheatley, and Ashburn Harrigan

Defendants

NOTICE OF DEFAULT

Upon application of the plaintiff, Cashman Equipment Corp., for an order of Default for failure of the defendants, EMCs Caribbean LTD., Craig Noblett, Nervin Wheatley, and Ashburn Harrigan, to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure, notice is hereby given that the defendants have been defaulted on October 7, 2021.

Robert M. Farrell,
Clerk of Court

Date: October 7, 2021

By: /s/ Arnold Pacho
Deputy Clerk

Scott Brownell

From: ECFnotice@mad.uscourts.gov
Sent: Thursday, October 7, 2021 3:27 PM
To: CourtCopy@mad.uscourts.gov
Subject: Activity in Case 1:21-cv-10862-RGS Cashman Equipment Corp. v. EMCS Caribbean LTD et al Notice: Clerk's Entry of Default

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

United States District Court

District of Massachusetts

Notice of Electronic Filing

The following transaction was entered on 10/7/2021 at 4:27 PM EDT and filed on 10/7/2021

Case Name: Cashman Equipment Corp. v. EMCS Caribbean LTD et al

Case Number: 1:21-cv-10862-RGS

Filer:

Document Number: 15

Docket Text:

NOTICE: Clerk's ENTRY OF DEFAULT as to EMCS Caribbean LTD, Ashburn Harrigan, Craig Noblett, Nervin Wheatley. Plaintiff is directed to serve defendants with this notice and provide proof of service on the docket. (Pacho, Arnold)

1:21-cv-10862-RGS Notice has been electronically mailed to:

Stephen W. Rider stephen.rider@swrpc.com

Scott D. Brownell scott@sbrownell.com

1:21-cv-10862-RGS Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=10/7/2021] [FileNumber=9528067-0]

][\[a770ac1bb9a2531622c9b88420f0cbfa6e5f8c11e0fa724b8934e0d0392648a1370
a2cf906bc5475e0332a6b4d3ffa16f5986b73f65d8ec901ef825b256226aa\]](#)]



BVI Financial Services Commission, Registry of Corporate Affairs
Register of Companies Search Report

Date of Search : 20/08/2021

This search is accurate as at the Search Date above.

Company Name : EMCS Caribbean Ltd

Company Number : 1551771

Company Type : BC New Incorporation

Date of Incorporation / Registration : 13/10/2009

Current Status

Status Description: Active

Status Date: 13/10/2009

Current Registered Agent: SHRM TRUSTEES (BVI) LIMITED

Trinity Chambers

P.O. Box 4301

Road Town

Tortola

VIRGIN ISLANDS, BRITISH

Current Registered Agent Phone Number: 284-494-8445

Current Registered Agent Fax Number: 284-494-8729

Trinity Chambers

P.O. Box 4301

Road Town

Tortola

VIRGIN ISLANDS, BRITISH

Telephone:

Agent Fax:

Director Register Type: Private

Share/Capital Information:

Maximum Number of Shares the company is authorized to issue: 50,000

Ability to Issue Bearer Shares: No

Previous Names History

S.No	Previous Name	Foreign Character Name	Date Range or Cease Date	
			From	To
1	EMCS Caribbean Ltd		13/10/2009	

Transaction History

S.No	Date	Transaction Number	Description	Status	Eforms/Attachments
1	02/10/2009	T090548867	Name Reservation (10 days)	Approved	Name Reservation (10 days)
2	13/10/2009	T090565324	Application for Incorporation (BC)	Approved	Application for Incorporation (BC) Memorandum and Articles of the Company
3	26/11/2010	T100811302	Annual Fee Submission (BC)	Approved	Annual Submission
4	15/06/2011	T110454488	Request for Certificate of Good Standing	Approved	Request for Certificate of Good Standing

EXHIBIT

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5	23/11/2011 T110814592	Goodstanding Annual Fee Submission (BC)	Approved	Standing Annual Submission
6	03/04/2012 T120161307	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
7	16/11/2012 T120789073	Annual Fee Submission (BC)	Approved	Annual Submission
8	11/09/2013 T130607430	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
9	06/11/2013 T130727607	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
10	14/11/2013 T130768802	Annual Fee Submission (BC)	Approved	Annual Submission
11	09/04/2014 T140182471	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
12	09/09/2014 T140615280	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
13	19/11/2014 T140803518	Annual Fee Submission (BC)	Approved	Annual Submission
14	08/06/2015 T150457424	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
15	17/09/2015 T150640845	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
16	30/09/2015 T150662692	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
17	16/11/2015 T150792792	Annual Fee Submission (BC)	Approved	Annual Submission
18	25/08/2016 T160586966	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
19	29/11/2016 T161105428	Annual Fee Submission (BC)	Approved	Annual Submission
20	27/03/2017 T170473807	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
21	28/03/2017 T170486670	Register of Members or Directors	Approved	Register of Directors
22	17/11/2017 T171250891	Annual Fee Submission (BC)	Approved	Annual Submission
23	14/05/2018 T180353299	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
24	15/11/2018 T180908076	Annual Fee Submission (BC)	Approved	Annual Submission
25	02/07/2019 T190487044	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
26	19/07/2019 T190521821	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
27	27/11/2019 T190849780	Annual Fee Submission (BC)	Approved	Annual Submission
28	01/09/2020 T200532164	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing
29	13/11/2020 T200711829	Annual Fee Submission (BC)	Approved	Annual Submission
30	22/12/2020 T200844072	Request for Certificate of Goodstanding	Approved	Request for Certificate of Good Standing

Certificate History

S.No	Transaction No.	Type of Certificate	Date of Filing
1	T09056324	Certificate of Incorporation (Original)	13/10/2009
2	T110454488	Certificate of Good Standing	15/06/2011
3	T120161307	Certificate of Good Standing	03/04/2012
4	T130607430	Certificate of Good Standing	11/09/2013
5	T130727607	Certificate of Good Standing	06/11/2013
6	T140182471	Certificate of Good Standing	09/04/2014
7	T140615280	Certificate of Good Standing	09/09/2014
8	T150457424	Certificate of Good Standing	08/06/2015
9	T150640845	Certificate of Good Standing	17/09/2015
10	T150662692	Certificate of Good Standing	30/09/2015
11	T160586966	Certificate of Good Standing	25/08/2016
12	T170473807	Certificate of Good Standing	27/03/2017
13	T180353299	Certificate of Good Standing	14/05/2018
14	T190487044	Certificate of Good Standing	02/07/2019

15	T190521821	Certificate of Good Standing	19/07/2019
16	T200532164	Certificate of Good Standing	01/09/2020
17	T200844072	Certificate of Good Standing	22/12/2020

DISCLAIMER:

Although care has been taken to ensure the accuracy, completeness and reliability of the information provided through the use of this service ("the Information"), neither the Registrar of Corporate Affairs ("the Registrar") nor the Financial Services Commission ("the Commission") assumes any responsibility for the accuracy, completeness and reliability of the Information. This report does not reflect any transactions that may be submitted and not yet registered, or other changes for which the Registrar has not received notice. The user of the Information agrees that the Information is subject to change without notice, and neither the Registrar nor the Commission is responsible for any discrepancies that may result if a transaction is approved for filing after the issuance of this report. Neither the Registrar nor the Commission assumes any responsibility for the consequences of use of the Information, nor for any infringement of third party intellectual property rights which may result from its use. In no event shall the Commission or the Registrar be liable for any direct, indirect, special or incidental damage resulting from, arising out of or in connection with the use of the Information.